

February 25, 2011

RECEIVED

FEB 28 2011

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602

Re: Case No. 2011-00000

Dear Mr. Derouen:

We are filing the enclosed original and ten (10) copies of a notice under the provisions of our Gas Cost Adjustment Clause, Case No. 09-00354. **This filing contains a Petition of Confidentiality and confidential documents.**

Due to high volumes resulting from the cold weather we've experienced this winter, the previous over-recovered gas cost balance was significantly reduced as detailed in Exhibit D of this filing. We are filing an interim GCA (out of the normal quarterly cycle) so that we can gradually reduce the negative impact to our customers. There was also an adjustment to correct for an error in our previous GCA filing as detailed in the Exhibit D Addendum.

Please indicate receipt of this filing by stamping and dating the enclosed duplicate of this letter and returning it in the self-addressed stamped envelope to the following address:

Atmos Energy Corporation 5430 LBJ Freeway, Suite 700 Dallas, TX 75240

If you have any questions, feel free to call me at 972-855-3769.

Sincerely,

Victor Edwards

Manager, Rate Administration

Vist- Ed-

Enclosures

COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:		
GAS COST ADJUSTMENT)	CASE NO.
FILING OF)	2011-00000
ATMOS ENERGY CORPORATION)	

PETITION FOR CONFIDENTIALITY OF INFORMATION BEING FILED WITH THE KENTUCKY PUBLIC SERVICE COMMISSION

Atmos Energy Corporation ("Atmos") respectfully petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 Section 7 and all other applicable law, for confidential treatment of the information which is described below and which is attached hereto. In support of this Petition, Atmos states as follows:

- 1. Atmos is filing its Gas Cost Adjustment ("GCA") for the monthly period commencing on April 1, 2011 through April 30, 2011. This GCA filing contains a change to Atmos' Correction Factor (CF) as well as information pertaining to Atmos' projected gas prices. The following two attachments contain information which requires confidential treatment.
 - a. The attached Exhibit D, Page 5 of 6 contains confidential information from which the actual price being paid by Atmos for natural gas to its supplier can be determined.
 - b. The attached Weighted Average Cost of Gas ("WACOG") schedule in support of Exhibit C, Page 2 of 2 contains confidential information pertaining to prices projected to be paid by Atmos for purchase contracts.

- 2. Information of the type described above has previously been filed by Atmos with the Commission under petitions for confidentiality. The Commission has consistently granted confidential protection to that type of information in each of the prior GCA filings in KPSC Case No. 1999-070. The information contained in the attached WACOG schedule has also been filed with the Commission under a Petition for Confidentiality in Case No. 97-513.
- 3. All of the information sought to be protected herein as confidential, if publicly disclosed, would have serious adverse consequences to Atmos and its customers. Public disclosure of this information would impose an unfair commercial disadvantage on Atmos. Atmos has successfully negotiated an extremely advantageous gas supply contract that is very beneficial to Atmos and its ratepayers. Detailed information concerning that contract, including commodity costs, demand and transportation charges, reservations fees, etc. on specifically identified pipelines, if made available to Atmos' competitors, (including specifically non-regulated gas marketers), would clearly put Atmos to an unfair commercial disadvantage. Those competitors for gas supply would be able to gain information that is otherwise confidential about Atmos' gas purchases and transportation costs and strategies. The Commission has accordingly granted confidential protection to such information.
- 4. Likewise, the information contained in the WACOG schedule in support of Exhibit C, Page 2 of 2, also constitutes sensitive, proprietary information which if publicly disclosed would put Atmos to an unfair commercial disadvantage in future negotiations.
- 5. Atmos would not, as a matter of company policy, disclose any of the information for which confidential protection is sought herein to any person or entity, except as required by law or pursuant to a court order or subpoena. Atmos' internal practices and policies are directed towards non-disclosure of the attached information. In fact, the information contained in the

attached report is not disclosed to any personnel of Atmos except those who need to know in order to discharge their responsibility. Atmos has never disclosed such information publicly. This information is not customarily disclosed to the public and is generally recognized as confidential and proprietary in the industry.

- 6. There is no significant interest in public disclosure of the attached information. Any public interest in favor of disclosure of the information is out weighed by the competitive interest in keeping the information confidential.
- 7. The attached information is also entitled to confidential treatment because it constitutes a trade secret under the two prong test of KRS 265.880: (a) the economic value of the information as derived by not being readily ascertainable by other persons who might obtain economic value by its disclosure; and, (b) the information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The economic value of the information is derived by Atmos maintaining the confidentiality of the information since competitors and entities with whom Atmos transacts business could obtain economic value by its disclosure.
- 8. Pursuant to 807 KAR 5:001 Section 7(3) temporary confidentiality of the attached information should be maintained until the Commission enters an order as to this petition. Once the order regarding confidentiality has been issued, Atmos would have twenty (20) days to seek alternative remedies pursuant to 807 KAR 5:001 Section 7(4).

WHEREFORE, Atmos petitions the Commission to treat as confidential all of the material and information which is included in the attached one volume marked "Confidential".

Respectfully submitted this 25th day of February, 2011.

Mark R. Hutchinson

611 Frederica Street

Owensboro, Kentucky 42301

Douglas Walther Atmos Energy Corporation P.O. Box 650250 Dallas, Texas 75265

John N. Hughes 124 W. Todd Street Frankfort, Kentucky 40601

Attorneys for Atmos Energy Corporation

COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT) Case No. 2011-00000
FILING OF)
ATMOS ENERGY CORPORATION)

NOTICE

INTERIM FILING

For The Period

April 1, 2011 - April 30, 2011

Attorney for Applicant

Mark R. Hutchinson 611 Frederica Street Owensboro, Kentucky 42301 Atmos Energy Corporation, ("the Company"), is duly qualified under the laws of the Commonwealth of Kentucky to do its business. The Company is an operating public utility engaged in the business of purchasing, transporting and distributing natural gas to residential, commercial and industrial users in western and central Kentucky. The Company's principal operating office and place of business is 3275 Highland Pointe Drive, Owensboro, Kentucky 42303. Correspondence and communications with respect to this notice should be directed to:

Mark A. Martin
Vice President of Rates & Regulatory Affairs
Kentucky/Mid-States Division
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, Kentucky 42303

Mark R. Hutchinson Attorney for Applicant 611 Frederica Street Owensboro, Kentucky 42301

Victor Edwards Manager, Rate Administration Atmos Energy Corporation 5430 LBJ Freeway, Suite 700 Dallas, Texas 75240 The Company gives notice to the Kentucky Public Service Commission, hereinafter "the Commission", pursuant to the Gas Cost Adjustment Clause contained in the Company's settlement gas rate schedules in Case No. 09-00354.

The Company hereby files Forty-Fourth Revised Sheet No. 4, Forty-Fourth Revised Sheet No. 5 and Forty-Fourth Revised Sheet No. 6 to its PSC No. 1, <u>Rates, Rules and Regulations for</u> Furnishing Natural Gas to become effective April 1, 2011.

The Gas Cost Adjustment (GCA) for firm sales service is \$5.2366 per Mcf and \$4.2781 per Mcf for interruptible sales service. The supporting calculations for the Forty-Fourth Revised Sheet No. 5 are provided in the following Exhibits:

Exhibit A – Comparison of Current and Previous Gas Cost Adjustment (GCA) Cases

Exhibit B – Expected Gas Cost (EGC) Calculation

Exhibit C - Rates used in the Expected Gas Cost (EGC) - NOTE: The pipeline tariff pages are not included in this filing but can be provided upon request.

Exhibit D – Correction Factor (CF) Calculation

Since the Company's last GCA filing, Case No. 2010-00526, the following changes have occurred in its pipeline and gas supply commodity rates for the GCA period.

- 1. The commodity rates per Mcf used are based on historical estimates and/or current data for the month of April, 2011, as shown in Exhibit C, page 1 of 2.
- 2. The G-1 Expected Commodity Gas Cost will be approximately \$5.4651 per Mcf for the month of April, 2011, as compared to \$5.6717 per Mcf used for the period of February 1, 2011 through March 31, 2011. The G-2 Expected Commodity Gas Cost will be approximately \$4.5066 for the month of April, 2011, as compared to \$4.7000 for the period February 1, 2011 through March 31, 2011.

- for the period February 1, 2011 through March 31, 2011.
- 3. The Company's notice sets out a new Correction Factor of (\$0.3454) per Mcf which will remain in effect until at least April 30, 2011.

The GCA tariff as approved in Case No. 92-558 provides for a Correction Factor (CF) which compensates for the difference between the expected gas cost and the actual gas cost for prior periods. A revision to the GCA tariff effective December 1, 2001, Filing No. T62-1253, provides that the Correction Factor be filed on a quarterly basis. In Case No. 2009-0354, effective June 1, 2010, the Company's GCA tariff allows recovery of any gas cost which is uncollectible, to be included in each February GCA filing.

The Company is filing its updated Correction Factor that is based upon the balance in the Company's 1910 Account as of December 31, 2010 (January, 2011 general ledger). The calculation for the Correction Factor is shown on Exhibit D, Page 1 of 6. Also beginning with the February GCA filing in compliance with tariff page 24 from the Rate Case filing (Case No. 2009-0354) the Company is allowed to recover the net uncollectible gas cost (net uncollectible gas cost less subsequently collected gas cost).

WHEREFORE, Atmos Energy Corporation requests this Commission, pursuant to the Commission's order in Case No. 99-070, to approve the Gas Cost Adjustment (GCA) as filed in Forty-Fourth Revised Sheet No. 5; and Forty-Fourth Revised Sheet No. 6 setting out the General Transportation Tariff Rate T-3 and T-4 for each respective sales rate for meter readings made on and after April 1, 2011.

DATED at Dallas, Texas this 25th Day of February, 2011.

ATMOS	EN	ER	GΥ	COI	RP	OR.	10ITA	V
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By: .							
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Victor Edwards Manager, Rate Administration Atmos Energy Corporation

For Entire Service Area
P.S.C. No. 1
Forty-Fourth SHEET No. 4
Cancelling
Forty-Third SHEET No. 4

ATMOS ENERGY CORPORATION

Current Rate Summary Case No. 2011-00000

Firm Service

Base Charge:

Residential (G-1) - \$12.50 per meter per month
Non-Residential (G-1) - 30.00 per meter per month
Transportation (T-4) - 300.00 per delivery point per month
Transportation Administration Fee - 50.00 per customer per meter

Rate per	Mcf ²		<u>Sales</u>	<u>s (G-1)</u>]	ransportation (T-4)	
First	300 ¹	Mcf	@	6.3366 per Mcf	@	1.1000 per Mcf	(I, N)
Next	14,700 1	Mcf	@	6.0066 per Mcf	@	0.7700 per Mcf	(I, N)
Over	15,000	Mcf	@	5.7366 per Mcf	@	0.5000 per Mcf	(I, N)

Interruptible Service

Base Charge - \$300.00 per delivery point per month
Transportation Administration Fee - 50.00 per customer per meter

Rate per	Rate per Mcf ²			s (G-2)	Transportation (T-3)					
First	15,000 ¹	Mcf	@	4.9081 per Mcf	@	0.6300 per Mcf		(I, N	l)	
Over	15,000	Mcf	@	4.6881 per Mcf	@	0.4100 per Mcf		(1, N	I)	

ISSUED: February 25, 2011

Effective: April 1, 2011

(Issued by Authority of an Order of the Public Service Commission in Case No. 2011-00000.)

ISSUED BY: Mark A. Martin - Vice President of Rates & Regulatory Affairs, Kentucky/Midstates Division

¹ All gas consumed by the customer (sales, transportation; firm and interruptible) will be considered for the purpose of determining whether the volume requirement of 15,000 Mcf has been achieved.

² DSM, PRP and R&D Riders may also apply, where applicable.

ATMOS ENERGY CORPORATION

Case No. 2011-00000	
<u>Applicable</u>	
For all Mcf billed under General Sales Service (G-1) and Interruptible Sales Service (G-2)	
Gas Charge = GCA	
GCA ≈ EGC + CF + RF + PBRRF	
Gas Cost Adjustment Components G-1 G-2	
EGC (Expected Gas Cost Component) 5.4651 4.506	6 (R, R)
CF (Correction Factor) (0.3454) (0.345	4) (1, 1)
RF (Refund Adjustment) (0.0203) (0.020	3) (N, N)
PBRRF (Performance Based Rate Recovery Factor) 0.1372 0.137	<u>2</u> (N, N)
GCA (Gas Cost Adjustment) \$5.2366 \$4.278	1 (1, 1)

ISSUED: February 25, 2011

Effective:

April 1, 2011

(Issued by Authority of an Order of the Public Service Commission in Case No. 2011-00000.)

ISSUED BY: Mark A. Martin - Vice President of Rates & Regulatory Affairs, Kentucky/Midstates Division

P.S.C. No. 1
Forty-Fourth SHEET No. 6
Cancelling
Forty-Third SHEET No. 6

ATMOS ENERGY CORPORATION

Current Transportation Case No. 2011-00000

The Transportation Rates (T-3 and T-4) for each respective service net monthly rate is as follows:

System Lost and Unaccounted gas percentage:

2.79%

				Simple Margin	Non- Commodity		Gross Margin		
Transportation								-	
<u>Firm Serv</u>	<u>rice (T-4)</u>								
First	300	Mcf	@	\$1.1000 +	\$0.0000	=	\$1.1000	per Mcf	(N)
Next	14,700	Mcf	@	0.7700 +	0.0000	=	0.7700	per Mcf	(N)
All over	15,000	Mcf	@	0.5000 +	0.0000	=	0.5000	per Mcf	(N)
<u>Interrupti</u>	ble Service (T	<u>3)</u>							
First	15,000	Mcf	@	\$0.6300 +	\$0.0000	=	\$0.6300	per Mcf	(N)
All over	15,000	Mcf	@	0.4100 +	0.0000	=	0.4100	per Mcf	(N)

ISSUED: February 25, 2011 Effective: April 1, 2011

(Issued by Authority of an Order of the Public Service Commission in Case No. 2011-00000.)

ISSUED BY: Mark A. Martin - Vice President of Rates & Regulatory Affairs, Kentucky/Midstates Division

¹ Excludes standby sales service.

Comparison of Current and Previous Cases Sales Service

(b) (c) (a) Case No. Line 2010-00526 2011-00000 Difference No. Description \$/Mcf \$/Mcf \$/Mcf <u>G - 1</u> 1 2 3 Distribution Charge (per Case No. 09-00354) 1.1000 0.0000 4 First 300 Mcf 1.1000 0.7700 0.0000 5 Next 14,700 Mcf 0.7700 0.5000 0.0000 6 Over 15,000 Mcf 0.5000 7 Gas Cost Adjustment Components 8 9 EGC (Expected Gas Cost): 4.4882 4.2977 (0.1905)10 Commodity 1.1674 (0.0161)Demand 1.1835 11 5.6717 5.4651 (0.2066)12 Total EGC CF (Correction Factor) (1.0078)(0.3454)0.6624 13 0.0000 (0.0203)(0.0203)RF (Refund Adjustment) 14 PBRRF (Performance Based Rate Recovery Factor) 0.1372 0.1372 0.0000 15 0.4558 GCA (Gas Cost Adjustment) 4.7808 5.2366 16 17 18 Rate per Mcf (GCA included) 5.8808 6.3366 0.4558 19 First 300 Mcf 20 14,700 Mcf 5.5508 6.0066 0.4558 Next 15,000 Mcf 5.2808 5.7366 0.4558 21 Over 22 23 24 <u>G - 2</u> 25 Distribution Charge (per Case No. 09-00354) 26 0.6300 0.6300 0.0000 27 15,000 Mcf First 0.4100 0.4100 0.0000 15,000 Mcf 28 Over 29 Gas Cost Adjustment Components 30 EGC (Expected Gas Cost): 31 4.4882 4.2977 (0.1905)32 Commodity 0.2089 0.2118 (0.0029)33 Demand 4.7000 4.5066 (0.1934)Total EGC 34 (0.3454)0.6624 (1.0078)35 CF (Correction Factor) 0.0000 RF (Refund Adjustment) (0.0203)(0.0203)36 0.1372 PBRRF (Performance Based Rate Recovery Factor) 0.1372 0.0000 37 3.8091 4.2781 0.4690 38 GCA (Gas Cost Adjustment) 39 Rate per Mcf (GCA included) 40 4.4391 4.9081 0.4690 300 Mcf 41 First 0.4690 4.6881 Over 14,700 Mcf 4.2191 42 43 44 45 Refund Factor (RF) Effective 47 RF Date 48 Case No. 49 1 -2010-00135 5/1/2010 (\$0.0102)50 2 -2010-00257 8/1/2010 (0.0033)51 52 2010-00386 11/1/2010 (0.0034)3 -4 -2010-00526 2/1/2011 (0.0034)53 54 (\$0.0203)55 Total Refund Factor (RF)

Atmos Energy CorporationComparison of Current and Previous Cases
Transportation Service

Exhibit A Page 2 of 2

				(a)	(b)	(c)
Line				Case	e No.	
No.	Description			2010-00526	2011-00000	Difference
				\$/Mcf	\$/Mcf	\$/Mcf
1	T -4 Transporta	ation Ser	vice / Firm Service (High Priority)			
2						
3	Simple Margin /	<u>Distributi</u>	on Charge (per Case No. 09-00354)			
4	First	300	Mcf	1.1000	1.1000	0.0000
5	Next	14,700	Mcf	0.7700	0.7700	0.0000
6	Over	15,000	Mcf	0.5000	0.5000	0.0000
7						
8						
9	T - 3 / Interrupt	ible Serv	rice (Low Priority)			
10						
11	Simple Margin /	<u>Distributi</u>	on Charge (per Case No. 09-00354)			
12	First	15,000	Mcf	0.6300	0.6300	0.0000
13	Over	15,000	Mcf	0.4100	0.4100	0.0000
14						

Expected Gas Cost (EGC) Calculation
Texas Gas Transmission - Non-Commodity

(b) (c) (d) (e) (a) **Non-Commodity Tariff** Line Annual Demand No. Description Sheet No. Units Rate **Total** \$/MMbtu \$ MMbtu \$ 1 SL to Zone 2 2 NNS Contract # 12,617,673 N000210/29760 0.3088 Base Rate 26 3,896,337 3,896,337 12,617,673 3,896,337 3,896,337 5 Total SL to Zone 2 6 7 SL to Zone 3 27,480,375 8 NNS Contract # N000340/29762 0.3543 9,736,297 9,736,297 9 Base Rate 26 10 11 FT Contract # 003355/29759 4,927,500 21 12 Base Rate 0.2494 1,228,919 1,228,919 13 10,965,216 10,965,216 14 Total SL to Zone 3 32,407,875 15 16 Zone 1 to Zone 3 21793/29761 17 FT Contract # 1.093,740 21 18 Base Rate 0.2194 239,967 239,967 10 239,967 239,967 1,093,740 20 Total Zone 1 to Zone 3 21 22 SL to Zone 4 23 NNS Contract # N000435/29763 3,320,769 1,391,402 Base Rate 0.4190 1,391,402 24 26 25 26 FT Contract # 003819/29765 1,277,500 27 Base Rate 21 0.3142 401,391 401,391 28 11 FT Contract # 31097 547,500 21 0.3142 172,025 172,025 12 Base Rate 19 5,145,769 1,964,818 1,964,818 29 Total SL to Zone 4 30 3,896,337 31 Total SL to Zone 2 12,617,673 3,896,337 10,965,216 32,407,875 10,965,216 32 Total SL to Zone 3 1,093,740 239,967 33 Total Zone 1 to Zone 3 239,967 34 51,265,057 35 Total Texas Gas 17,066,337 17,066,337 36 37 17,066,337 17,066,337 38 Total Texas Gas Area Non-Commodity

Exhibit B Page 2 of 8

Expected Gas Cost (EGC) Calculation
Tennessee Gas Pipeline - Non-Commodity

		(a)	(b)	(c)	(d) (e) Non-Commodity	
Line		Tariff	Annual	•		
No. Description		Sheet No.	Units	Rate	Total	Demand
			MMbtu	\$/MMbtu	\$	\$
1 <u>0 to Zone 2</u>	0540.4		12 044	9.0600		
2 FT-G Contract # 3 Base Rate	2546.1	23	12,844	9.0600	116,367	116,367
4		20		3.0000	110,001	110,001
5 FT-G Contract #	2548.1		4,363	9.0600		
6 Base Rate		23	,	9.0600	39,529	39,529
7						
8 FT-G Contract #	2550.1		5,739	9.0600		
9 Base Rate		23		9.0600	51,995	51,995
10			4.440	0.0000		
11 FT-G Contract #	2551.1	00	4,446	9.0600	40.004	40.004
12 Base Rate 13		23		9.0600	40,281	40,281
14 Total Zone 0 to 2			27,392		248,172	248,172
15		_	21,002			
16 1 to Zone 2						
17 FT-G Contract #	2546		114,156	7.6200		
18 Base Rate		23		7.6200	869,869	869,869
19						
20 FT-G Contract #	2548		44,997	7.6200		
21 Base Rate		23		7.6200	342,877	342,877
22						
23 FT-G Contract #	2550	00	59,741	7.6200	455 000	455.000
24 Base Rate		23		7.6200	455,226	455,226
25 26 FT-G Contract #	2551		45,059	7.6200		
27 Base Rate	2001	23	45,059	7.6200	343,350	343,350
28 Dase Nate		20		7.0200	040,000	0-10,000
29 Total Zone 1 to 2 a	and Zone 0 to 2	-	291,345		2,259,494	2,259,494
30		_				
31 Gas Storage						
32 Production Area:						
33 Demand		61	34,968	2.0200	70,635	70,635
34 Space Charge		61	4,916,148	0.0248	121,920	121,920
35 Market Area:		0.4	007.400	4.4500	070 040	070.040
36 Demand		61	237,408	1.1500	273,019	273,019
37 Space Charge		61 _	10,846,308 16,034,832	0.0185	200,657 666,231	200,657 666,231
38 Total Storage 39			10,004,002		000,231	000,201
	Gas Area FT-G Non-Comi	modity			2,925,725	2,925,725

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Texas Gas Transmission - Commodity Purchases

		(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Description	Tariff Sheet No.		Duro	chases	Rate	Total
NO.	Description	Sileet No.		Mcf	MMbtu	\$/MMbtu	\$
				10101	Wilvibla	φπιποτα	Ψ
1	No Notice Service				1,821,253		
2	Indexed Gas Cost					3.9814	7,251,188
3	Commodity (Zone 3)	26				0.0509	92,702
4	Fuel and Loss Retention @	36	2.65%		_	0.1084	197,424
5						4.1407	7,541,314
6							
7	Firm Transportation				644,400		
8	Indexed Gas Cost					3.9814	2,565,632
9	Base (Weighted on MDQs)					0.0441	28,418
10	ACA	22				0.0019	1,224
11	Fuel and Loss Retention @	36	2.65%			0.1084	69,853
12	N. N. C. O.					4.1358	2,665,127
13	No Notice Storage						
14	Net (Injections)/Withdrawals						0
15 16	Withdrawals				(330,339)	3.9814	(1,315,221)
17	Injections	26			(330,339)	0.0509	(1,313,221)
18	Commodity (Zone 3) Fuel and Loss Retention @	36	2.65%			0.1084	(35,809)
19	Fuel and Loss Netention @	30	2.0070		(330,339)	4.1407	(1,367,844)
20					(000,000)	4.1407	(1,007,044)
21							
22	Total Purchases in Texas Area	3			2,135,314	4.1392	8,838,597
23		_					
24							
25	Used to allocate transportation	non-commo	dity				
26		**************************************					
27				Annualized		Commodity	
28				MDQs in		Charge	Weighted
29	Texas Gas			MMbtu	Allocation	\$/MMbtu	Average
30	SL to Zone 2	22		12,617,673	24.61%	\$0.0399	\$ 0.0098
31	SL to Zone 3	22		32,407,875	63.22%	0.0445	\$ 0.0281
32	1 to Zone 3	22		1,093,740	2.13%	0.0422	\$ 0.0009
33	SL to Zone 4	22		5,145,769	10.04%	0.0528	\$ 0.0053
34	Total			51,265,057	100.00%	:	\$ 0.0441
35						·	
36	Tennessee Gas						
37	0 to Zone 2	24		27,392	9.40%	\$0.0880	\$ 0.0083
38	1 to Zone 2	24		263,953	90.60%	0.0776	0.0703
39	Total			291,345 _	100.00%	:	\$ 0.0786

Expected Gas Cost (EGC) Calculation

Tennessee Gas Pipeline - Commodity Purchases

Exhibit B Page 4 of 8

(a) (b) (c) (d) (e) (f)

Line	Tariff					
No. Description	Sheet No.		Pui	rchases	Rate	Total
			Mcf	MMbtu	\$/MMbtu	\$
1 <u>FT-A and FT-G</u>				501,884		
2 Indexed Gas Cost					3.9814	1,998,215
3 Base Commodity (Weighted on MDQs)					0.0786	39,437
4 ACA	24				0.0019	954
5 Fuel and Loss Retention	32	4.28%			0.1780	89,335
6					4.2399	2,127,941
7						
8 <u>FT-GS</u>				27,600		
9 Indexed Gas Cost					3.9814	109,887
10 Base Rate	26				0.5844	16,129
11 ACA	24				0.0019	52
12 Fuel and Loss Retention	32	4.28%			0.1780	4,913
13					4.7457	130,981
14						
15 Gas Storage						
16 FT-A & FT-G Market Area Withdrawals						-
17 FT-A & FT-G Market Area Injections				(175,192)	3.9814	(697,514)
18 Withdrawal Rate	61				0.0102	0
19 Injection Rate	61				0.0102	(1,787)
20 Fuel and Loss Retention	61	1.49%			0.0000) o
21 Total				(175,192)	3.9916	(699,301)
22				, , ,		, , ,
23						
24						
25 Total Tennessee Gas Zones				354,292	4.4021	1,559,621

Atmos Energy Corporation Expected Gas Cost (EGC) Calculation Trunkline Gas Company
Commodity

Exhibit B Page 5 of 8

Commo	odity	(a)	(b)	(c)	(d)	(e)	(f)
Line		Tariff		_		_ ,	
No.	Description	Sheet No.		Purc	hases	Rate	Total
				Mcf	MMbtu	\$/MMbtu	\$
	1 Firm Transportation						
	2 Expected Volumes				30,000		
	3 Indexed Gas Cost					3.9814	119,443
	4 Base Commodity	10				0.0130	390
	6 ACA	10				0.0019	57
	7 Fuel and Loss Retention	10	2.01%			0.0817	2,451
	8					4.0780	122,341
	9						

Non-Commodity

10

		(a)	(b)	(c)	(d)	(e)
				No	n-Commo	dity
Line		Tariff	Annual			
No.	Description	Sheet No.	Units	Rate	Total	Demand
			MMbtu	\$/MMbtu	\$	\$
	Injections					
1	1 FT-G Contract # 014573		27,000			
12	2 Discount Rate on MDQs			7.2711	196,320	196,320
13	3					
14	4 Total Trunkline Area Non-Con	nmodity			196,320	196,320

Expected Gas Cost (EGC) Calculation Demand Charge Calculation

Exhibit B Page 6 of 8

Line					. D	
No.		_ (a)	(b)	(c)	(d)	(e)
1	Total Demand Cost:					
2	Texas Gas Transmission	\$17,066,337				
3	Midwestern	0				
4	Tennessee Gas Pipeline	2,925,725				
5	Trunkline Gas Company	196,320				
6	Total	\$20,188,382				
7						
8			Allocated	Related	Monthly De	emand Charge
9	Demand Cost Allocation:	Factors	Demand	Volumes	Firm	Interruptible
10	All	0.1804	\$3,641,984	17,434,480	0.2089	0.2089
11	Firm	0.8196	16,546,398	17,263,240	0.9585	
12	Total	1.0000	\$20,188,382	_	1.1674	0.2089
13				•		
14			Volumetric	: Basis for		
15		Annualized	Monthly Den	nand Charge		
16		Mcf @14.65	All	Firm		
17	Firm Service					
18	Sales:					
19	G-1	17,263,240	17,263,240	17,263,240	1.1674	
20						
21	Interruptible Service					
22	Sales:					
23	G-2	171,240	171,240		1.1674	0.2089
24						
25	Transportation Service					
26	T-3 & T-4	21,185,357				
27					-	
28		38,619,837	17,434,480	17,263,240	_	

Expected Gas Cost (EGC) Calculation Commodity - Total System

Exhibit B Page 7 of 8

(a)

(b)

(c)

(d)

	ī	n	0

No. Description		Purchase	es	Rate	Total
·		Mcf	MMbtu	\$/Mcf	\$
1 <u>Texas Gas Area</u>					
2 No Notice Service		1,813,094	1,821,253	4.1594	7,541,314
3 Firm Transportation		641,513	644,400	4.1544	2,665,127
4 No Notice Storage		(328,859)	(330,339)	4.1594	(1,367,844)
5 Total Texas Gas Area	*****	2,125,748	2,135,314	4.1579	8,838,597
6	••·				
7 <u>Tennessee Gas Area</u>					
8 FT-A and FT-G		492,671	501,884	4.3192	2,127,941
9 FT-GS		27,093	27,600	4.8345	130,981
10 Gas Storage			,		, , , , , ,
11 Injections		(171,976)	(175,192)	4.0663	(699,301)
12 Withdrawals		0	0	0.0000	` ′ 0′
13	-	347,788	354,292	4.4844	1,559,621
14 Trunkline Gas Area			- 1		
15 Firm Transportation		29,703	30,000	4.1188	122,341
16		20,700		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,
17					
18 WKG System Storage					
19 Injections		(745,819)	(749,175)	4.1407	(3,088,234)
20 Withdrawals		0	0	0.0000	O O
21 Net WKG Storage		(745,819)	(749,175)	4.1407	(3,088,234)
22		(1.15,575)	(* :=, ::=)		(-,,,,
23					
24 Local Production		459,447	468,177	3.9814	1,829,255
25		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, , , , ,		.,
26					
27					
28 Total Commodity Purchases	····	2,216,867	2,238,608	4.1778	9,261,580
29					-, -,
30 Lost & Unaccounted for @	2.79%	61,850	62,457		
31		- 1,	,		
32 Total Deliveries		2,155,017	2,176,151	4.2977	9,261,580
33		, · · - ₁ - · · ·	,		,
34					
35					
36 Total Expected Commodity Cost		2,155,017	2,176,151	4.2977	9,261,580
37					

37 38

39 Note: Column (c) is calculated by dividing column (d) by column (a)

Expected Gas Cost (EGC) Calculation
Load Factor Calculation for Demand Allocation

Exhibit B Page 8 of 8

Line			
No.	Description	MCF	
	Annualized Volumes Subject to Demand Charges		
1	Sales Volume	17,434,480	
2	Transportation	0_	
3	Total Mcf Billed Demand Charges	17,434,480	
4	Divided by: Days/Year	365_	
5	Average Daily Sales and Transport Volumes	47,766	
6			
7	Peak Day Sales and Transportation Volume		
8	Estimated total company firm requirements for 5 degree average		
9	temperature days from Peak Day Book - with adjustments per rate filing	264,714_	Mcf/Peak Day
10			
11			
12	New Load Factor (line 5 / line 9)	0.1804	

Basis for Indexed Gas Cost For the Month of April 2011

The projected commodity price was provided by the Gas Supply Department and was based upon the following: The Gas Supply Department reviewed the NYMEX futures close prices for the month of April 2011 during the period February 10 through February 18, 2011 Ą

		Apr-11 (\$/MMBTU)
Thursday	02/10/11	4.037
Friday	02/11/11	3.977
Monday	02/14/11	3.991
Tuesday	02/15/11	4.030
Wednesday	02/16/11	3.961
Thursday	02/17/11	3.968
Friday	02/18/11	3.906

The Company believes prices will remain stable and prices for the month of April 2011 will settle at \$3.981 per MMBTU (based on the average of the past seven days) for the period that the GCA is to become effective. Ä.

In support of Item B, a worksheet entitled "Estimated Weighted Average Cost of Gas" has been filed under a Petition for Confidentiality in this Case.

Atmos Energy Corporation Estimated Weighted Average Cost of Gas For the Month of April 2011

April-11
Volumes Rate Value

Texas Gas Trunkline Tennessee Gas TX Gas Storage TN Gas Storage WKG Storage

(This information has been filed under a Petition for Confidentiality)

Exhibit D Correction Factor (CF) Page 1 of 6 For the Two Months Ended December 2010 Case No. 2011-00000

	(a)	(b)	(c)	(d) Actual GCA	(e) Under (Over)	(f)		(g)
Line No.	Month	Actual Purchased Volume (Mcf)	Recoverable Gas Cost	Recovered Gas Cost	Recovery Amount	Adjustments *		Total
1 2	November-10	1,446,641	\$8,998,168.29	\$5,907,508.00	\$3,090,660.29	(\$80,368.98)		\$3,010,291.31
3	December-10	3,982,805	\$19,794,905.58	\$16,186,677.89	\$3,608,227.69	\$0.00		\$3,608,227.69
5 6	January-11	0	\$0.00	\$0.00	\$0.00	\$0.00		\$0.00
7 8 9 10	Total Gas Cost Under/(Over) Red	covery	\$28,793,073.87	\$22,094,185.89	\$6,698,887.98	(\$80,368.98)	galance	\$6,618,519.00
11 12 13	PBR Savings refl							
14	Correction Factor	r - Part 1						
15		(\$18,147,234.16)						
16	(Over)/Under Recovered Gas Cost through October 2010 (November 2010 GL) Correction to October 2010 Recoveries					\$34,822.21		
17	Total Gas Cost U	Inder/(Over) Recove	ry for the three mo	nths ended Januai	ry 2011	6,618,519.00		
18		utstanding Ćorrectior				4,895,482.08		
19	·	-	. ,					
20	(Over)/Under Re	covered Gas Cost th	rough October 201	IO (November 2010	0 GL) (a)	\$ (6,598,410.87)		
21	Divided By: Tota	I Expected Custome	r Sales (b)			17,434,480	Mcf	
22								
23	Correction Factor	r - Part 1				(\$0.3785)	/ Mcf	
24								
25	Correction Factor							
26		Gas Cost through N				577,952.15		
27	Divided By: Tota	I Expected Custome	r Sales (b)			17,434,480		
28 29 30	Correction Factor	r - Part 2				\$0.0331	/ Mcf	
31	Correction Fact	or - Total (CF)				(\$0.3454)	/ Mcf	

Recoverable Gas Cost Calculation For the Two Months Ended December 2010 Case No. 2011-00000 Exhibit D Page 2 of 6

Ousc	140. 2011-00000	GL	Dec-10	Jan-11	Feb-11
Line			(a)	(b) Month	(c)
No.	Description	Unit	November-10	December-10	January-11
1	Supply Volume				
2	Pipelines:				
3	Texas Gas Transmission ¹	Mcf	0	0	0
4	Tennessee Gas Pipeline ¹	Mcf	0	0	0
5	Trunkline Gas Company ¹	Mcf	0	0	0
6	Midwestern Pipeline 1	Mcf	0	0	0
7	Total Pipeline Supply	Mcf	0	0	0
8	Total Other Suppliers	Mcf	450,559	754,566	0
9	Off System Storage				
10	Texas Gas Transmission	Mcf	0	0	0
11	Tennessee Gas Pipeline	Mcf	0	0	0
12	System Storage				
13	Withdrawals	Mcf	766,411	1,706,004	0
14	Injections	Mcf	(2,305)	(14,887)	0
15	Producers	Mcf	8,664	52,791	0
16	Third Party Reimbursements	Mcf	(28)	(396)	
17	Pipeline Imbalances cashed out	Mcf	0	0	0
18	System Imbalances ²	Mcf	223,340	1,484,727	0
19	Total Supply	Mcf	1,446,641	3,982,805	0
20					
21	Change in Unbilled	Mcf			
22	Company Use	Mcf	0	0	0
23	Unaccounted For	Mcf	0	0	00
24	Total Purchases	Mcf	1,446,641	3,982,805	_

¹ Includes settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Recoverable Gas Cost Calculation For the Two Months Ended December 2010

Case No. 2011-00000

Exhibit D Page 3 of 6

Case	NO. 2011-00000	GL	Dec-10	Jan-11	Feb-11
Line			(a)	(b) Month	(c)
No.	Description	Unit	November-10	December-10	January-11
1	Supply Cost				
2	Pipelines:				
3	Texas Gas Transmission ¹	\$	1,579,579	1,701,955	0
4	Tennessee Gas Pipeline ¹	\$	325,763	340,755	0
5	Trunkline Gas Company 1	\$	30,141	29,760	0
6	Midwestern Pipeline 1	\$	0	0	0
7	Total Pipeline Supply	\$	1,935,484	2,072,470	0
8	Total Other Suppliers	\$	1,248,007	3,043,599	0
9	Hedging Settlements	\$	507,872	708,947	0
10	Off System Storage				
11	Texas Gas Transmission	\$	0	0	0
12	Tennessee Gas Pipeline	\$	0	0	0
13	WKG Storage	\$	122,500	122,500	0
14	System Storage				
15	Withdrawals	\$	4,193,411	7,086,530	0
16	Injections	\$	(8,055)	(63,271)	0
17	Producers	\$	30,169	195,799	-
18	Third Party Reimbursements	\$	(1,025)	(3,042)	
19	Pipeline Imbalances cashed out	\$	0	0	0
20	System Imbalances ²	\$	969,806	6,631,373	0_
21	Sub-Total	\$	8,998,168	19,794,906	0
22	Pipeline Refund + Interest				
23	Change in Unbilled	\$			
24	Company Use	\$	0	0	0
25	Recovered thru Transportation	\$	0_	0	00
26	Total Recoverable Gas Cost	\$	8,998,168	19,794,906	0

¹ Includes demand charges, cost of settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Exhibit D Page 4 of 6

Recovery from Correction Factors (CF) For the Two Months Ended December 2010 Case No. 2011-00000 **Atmos Energy Corporation**

Case	Case No. 2011-00000											
			(a)	(q)	(၁)	(p)	(e)	()	(b)	(Ļ	<u>(</u>)	(<u>(</u>)
Line				CF	R	RF	RF	PBR	PBRRF	GCA	GCA Recovery	Total
Š.	Month	Type of Sales	Mcf Sold	Rate	Amounts	Rate	Amounts	Rate	Amounts	Rate	Amounts	Recoveries
~	November-10	G-1 Sales	991,253.4	(\$1.2939)	(\$1.2939) (\$1,282,582.77)	(\$0.0169)	(\$16,752.18)	0.1298	\$128,664.69	\$5.8522	\$5,801,013.15	\$4,630,342.89
2		G-2 Sales	21,506.8	(1.2939)	(27,827.69) (\$0.0169)	(\$0.0169)	(363.47)	0.1298	2,791.59	\$4.8805	104,964.08	\$79,564.51
9		Sub Total	1,012,760.2		(\$1,310,410.46)		(\$17,115.65)		\$131,456.28	•	\$5,905,977.23	\$4,709,907.40
7		Timing: Cycle Billing and PPA's			72.24		(0.40)		(\$2.73)	,	1,530.77	\$1,599.88
∞		Total	1,012,760.2	, —	(\$1,310,338.22)		(\$17,116.05)	I	\$131,453.55		\$5,907,508.00	\$4,711,507.28
თ												
10												
7	December-10	G-1 Sales	2,742,065.1	(\$1.2939)	(\$1.2939) (\$3,547,958.03) (\$0.0169)	(\$0.0169)	(\$46,340.90)	0.1298	\$355,920.05		\$16,047,113.38	\$12,808,734.50
12		G-2 Sales	28,734.5	(1.2939)	(37,179.57)	(\$0.0169)	(485.61)	0.1298	3,729.74	\$4.8805	140,238.73	\$106,303.29
16		Sub Total	2,770,799.6		(\$3,585,137.60)		(\$46,826.51)		\$359,649.79		\$16,187,352.11	\$12,915,037.79
17		Timing: Cycle Billing and PPA's	S,1		(6.26)		(1.55)		\$0.44	,	(674.22)	(\$681.59)
78		Total	2,770,799.6	ļ	(\$3,585,143.86)		(\$46,828.06)		\$359,650.23		\$16,186,677.89	\$12,914,356.20
19												
20												
21	January-11	G-1 Sales	0.0	(\$1.2939)	\$0.00		\$0.00	0.1298	\$0.00	\$5.8522	\$0.00	\$0.00
22	•	G-2 Sales	0.0	0.0 (1.2939)	00.00	(\$0.0169)	0.00	0.1298	0.00	\$4.8805	0.00	\$0.00
26		Sub Total	0.0		\$0.00		\$0.00	l	\$0.00		\$0.00	\$0.00
27		Timing: Cycle Billing and PPA's	s,\	•	0.00	•	00.00	ļ	\$0.00	•	0.00	\$0.00
28		Total	0.0		\$0.00		\$0.00		\$0.00		\$0.00	\$0.00
29												
30				'								
31	Total Recovery fro	Total Recovery from Correction Factor (CF)			(\$4,895,482.08)							
32	Total Amount Refu	Fotal Amount Refunded through the Refund Factor (RF)	r (RF)	ł			(\$63,944.11)					
33	Total Recovery fro	Fotal Recovery from Performance Based Rate Recovery Factor (PBRRF)	covery Factor (F	PBRRF)		İ		II	\$491,103.78	٠		
34	Total Recoveries	Fotal Recoveries from Expected Gas Cost (EGC) Factor	Factor							••	\$22,094,185.89	Committee of the Commit
35	Total Recoveries	Total Recoveries from Gas Cost Adjustment Factor (GCA)	or (GCA)									\$17,625,863.48
1												

NOTE: The cycle billing is a result of customers being billed by the meter read date. The prior period adjustments (PPA's) consist of billing revisions/adjustments.

Detail Sheet for Supply Volumes & Costs Traditional and Other Pipelines

Exhibit D Page 5 of 6

		Nove	mber, 2010	Dece	ember, 2010	Janua	ary, 2011
	Description	MCF	Cost	MCF	Cost	MCF	Cost
1 2 3 4 5 6 7 8 9 10 11 12 13 14	Texas Gas Pipeline Area LG&E Natural Texaco Gas Marketing CMS WESCO Southern Energy Company Union Pacific Fuels Atmos Energy Marketing, LLC Engage ERI Prepaid Reservation Hedging Costs - All Zones						
	Total Tennessee Gas Pipeline Area	290,478	\$724,335.73	504,582	\$1,845,172.65	0	\$0.00
19 20 21 22 23 24 25	Atmos Energy Marketing, LLC Union Pacific Fuels WESCO Prepaid Reservation Fuel Adjustment				-	- Address of the Control of the Cont	
26 27 28	Total	70,856	\$224,325.39	160,388	\$680,962.52	0	\$0.00
29 30 31 32 33 34 35	Trunkline Gas Company Atmos Energy Marketing, LLC Engage Prepaid Reservation Fuel Adjustment						
36 37 38	Total	89,225	\$299,345.91	89,596	\$517,464.07	0	\$0.00
39 40 41 42 43 44 45	Prepaid Reservation Fuel Adjustment						
46 47 48 49	Total	0	\$0.00	0	\$0.00	0	\$0.00
51 52		450,559	\$1,248,007.03	754,566	\$3,043,599.24	0	\$0.00
53 54		**** Detail of \	olumes and Prices I	las Been Filed	Under Petition for Co	nfidentiality ****	

Atmos Energy Corporation Kentucky/Mid-States Division Kentucky Service Area Net Uncollectible Gas Cost Six Months Ended November, 2010

							Net	Net
	Gas Cost	Margin Written	Margin Written Taxes & Other Total Written Gas Cost	Total Written	Gas Cost	Margin	Uncollectible	Uncollectible
Month	Month Written Off	Off	Written Off	JO.	Collected	Collected	Collected Gas Cost	Gas Cost
6/1/2010	3/1/2010 (\$146,711.88)	(\$52,868.35)	(\$9,922.33)	(\$9,922.33) (\$209,502.56) \$2,696.20	\$2,696.20	\$925.30	\$925.30 \$144,015.68	\$144,015.68
7/1/2010	7/1/2010 (\$251,199.27)	(\$103,974.03)	(\$16,530.85)	(\$16,530.85) (\$371,704.15) \$2,684.29	\$2,684.29	\$1,057.81	\$1,057.81 \$248,514.98	\$392,530.66
8/1/2010	3/1/2010 (\$183,153.88)		(\$60,471.17)	\$60,471.17) (\$343,704.92) \$7,547.16		\$3,567.54	\$3,567.54 \$175,606.72	\$568,137.38
9/1/2010	9/1/2010 (\$79,588.88)	(\$57,697.62)	(\$5,542.24)	(\$5,542.24) (\$142,828.74) \$13,611.13	\$13,611.13	\$7,381.24	\$65,977.75	\$634,115.13
10/1/2010	(\$36,554.37)	(\$40,423.68)	(\$3,020.33)	(\$3,020.33) (\$79,998.38) \$38,970.90 \$21,142.79	\$38,970.90	\$21,142.79	(\$2,416.53)	\$631,698.60
11/1/2010	11/1/2010 (\$12,575.60)	(\$17,832.93)	(\$1,231.56)	(\$1,231.56) (\$31,640.09) \$66,322.05 \$36,096.77	\$66,322.05	\$36,096.77	(\$53,746.45)	\$577,952.15

Atmos Energy Corporation
Kentucky/Mid-States Division
Kentucky Service Area
Correction to October 2010 Recoveries Detail

Process Machinery, an Industrial customer (Customer 53869; Premise 92845), had a metering problem that caused Banner, the company's billing system, to produce a bill for negative consumption of 299,421 Mcf. The bill created a GCA credit of -\$1,595,644.45 on November 1, 2010 which was the EOM (end of month) cycle for October, 2010 billings. Our customer service group did not let the bill go out but issued a "Cancel / Rebill" which adjusts off the erroneous amounts and re-calculates the new correct amount. In this case, the Cancel / Rebill occurred on November 2, 2010 which was Cycle 1 for November, 2010 billings.

When the data flowed from Banner to the company's General Ledger (GL), the timing of that activity caused October GCA billings to be under-stated by \$1.6M and November GCA billings to be over-stated by that amount. Accounting booked a reversing accrual for this so that the GL would accurately reflect the proper recoveries.

For Industrial customers, the company accounts for Gas Cost Recoveries in the following accounts:

<u>Account</u>	<u>Description</u>	<u>DR/CR</u>
4812.311	Industrial Revenue - Banner	CR
1420.1092	Customer Accounts Receivable	DR
8053.0478	PGA for Industrial	DR
1910.1409	Unrecovered Purchased Gas Cost - Recoveries	CR
1910.1409	Unrecovered Purchased Gas Cost - PBR Recoveries	CR
1910.2731	Unrecovered Purchased Gas Cost - Pipeline Refunds	DR

When Accounting booked the reversing accrual, they should have booked it as:

DR/CR	<u>Account</u>	<u>Mcf</u>	<u>Rate</u>		<u>Amount</u>
CR	1910.14088	299,421		\$6.6338	\$1,986,299.03
DR	1910.14088	299,421		(1.4210)	(\$425,477.24)
CR	1910.14087	299,421		(0.0135)	(\$4,042.18)
DR	1910.27314	299,421		0.1298	\$38,864.85
DR	8053.04775	299,421		\$5.3291	\$1,595,644.45

Accounting booked the whole Credit to 1910.14088 as:

DR/CR	<u>Account</u>	<u>Amount</u>
CR	1910.14088	\$1,595,644.45
DR	8053.04775	\$1,595,644.45

The \$35k that should have been recorded in Accounts 1910.14087 and 1910.27314, were recorded in 1910.14088 which is the account balance that is reported on Exhibit D. In the original Feb-11 GCA filling, the analyst had an adjustment under "Timing: Cycle Billing and PGAs" (Exhibit D, Page 4 of 6, Line 27, Column (i) for \$34,767.83). That bulk of that adjustment was the result of Accounting accruing ALL of the amount to 1910.14088 instead of the other two deferred accounts.

Since it is a reversing accrual, it would be a wash over the two production months of October, and November, 2010. But since we filed the GCA filing to show recoveries through October, technically, the filed balance included the erroneous \$35k.